

1 J. David Bickham (SBN 145449)  
2 Email: [dbickham@reedsmith.com](mailto:dbickham@reedsmith.com)  
3 Claire Hass (SBN 253868)  
4 Email: [chass@reedsmith.com](mailto:chass@reedsmith.com)  
5 REED SMITH LLP  
6 101 Second St., Suite 1800  
7 San Francisco, CA 94105  
8 Telephone: (415) 543-8700  
9 Facsimile: (415) 291-8269

10 Attorneys for Defendant  
11 AMERICAN MEDICAL SYSTEMS, INC.

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

12 RAMONA FOLEY and KEVIN FOLEY,  
13 Plaintiff(s),  
14 vs.  
15 AMERICAN MEDICAL SYSTEMS, INC.  
16 Defendant(s).

Case No.: 11cv5014 EJD

Before the Honorable Edward J. Davila

**[PROPOSED] ORDER TO STAY  
PROCEEDINGS PENDING RESOLUTION  
OF THE PARTIES' MOTIONS PURSUANT  
TO 28 U.S.C. § 1407**

Compl. Filed: October 11, 2011  
Trial Date: None Set

1 After full consideration of the parties' Stipulation to Stay Proceedings Pending  
2 Resolution of the Parties' Motions Pursuant to 28 U.S.C. § 1407, the accompanying Request for  
3 Judicial Notice in support of the Stipulation, and good cause appearing:

4 IT IS HEREBY ORDERED this case is STAYED until either (1) 30 days after the MDL panel  
5 has issued a ruling on the currently pending motion for coordination or consolidation, or (2)  
6 March 30, 2012, whichever date occurs earlier. The parties may apply to lift or extend this  
stay at any time should the circumstances so require.

7  
8  
9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10  
11 DATED: January 17, 2012.

12   
13 The Honorable Edward J. Davila